

1 Hon. Ricardo S. Martinez
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 COSMOS GRANITE (WEST), LLC, a
Washington limited liability company,

10 Plaintiff,

11 v.

12 MINAGREX CORPORATION, d/b/a MGX
Stone,

13 Defendant.

14 Case No. 2:19-cv-01697-RSM

15 **STIPULATED MOTION TO SEAL
DOCUMENT IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION FOR
EXTENSION OF CERTAIN
DEADLINES**

16 **Noted on Motion Calendar:
August 11, 2021**

17 Pursuant to Local Civil Rule 5(g), Plaintiff, Cosmos Granite (West), LLC (“Cosmos”) and
18 Defendant, Minagrex Corporation d/b/a/ MGX Stone (“Minagrex”) jointly request that the Court
19 enter an order to Seal/Redact Exhibit 8 to the Declaration of Rachel S. Black in Support of
20 Plaintiff’s Opposition to Defendant’s Motion for Extension of Certain Deadlines (“Black Decl.”).
21 This exhibit, the July 16, 221 Supplemental Letter of expert Paul Pederson, contains confidential
22 information, which Minagrex marked “HIGHLY CONFIDENTIAL – ATTORNEY EYES ONLY”
23 pursuant to the Protective Order entered in this case. Plaintiff takes no position concerning the
24 confidentiality of Exhibit 8.

25 Defendant’s position is that the designation of Exhibit 8 should be maintained to protect the
26 legitimate private interests of Minagrex in accordance with the Stipulated Protective Order [Dkt.
27 16]. Exhibit 8 referenced contains previously nondisclosed sales and financial information. As such,

STIPULATED MOTION TO SEAL - 1
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SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, WA 98101-3000
Tel: (206) 516-3880; Fax: (206) 516-3883

1 the information referenced satisfies Section 2.3 of the Stipulated Protective Order [Dkt. 16.]
2 Minagrex expects that the revelation of the information referenced in Exhibit 8 would prove
3 harmful to it. Finally, Minagrex believes that a less restrictive alternative is not sufficient to protect
4 the confidential information referenced because redaction of the same would substantively frustrate
5 the purpose of its admission.

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7 Dated: July 11, 2021

By: /s/ Rachel S. Black

Rachel S. Black, WSBA #32204

rblack@susmangodfrey.com

Alexander W. Aiken (*Pro Hac Vice*)

aiken@susmangodfrey.com

Benjamin Manne, WSBA # 54537

bmanne@susmangodfrey.com

SUSMAN GODFREY L.L.P.

1201 Third Avenue, Suite 3800

Seattle, WA 98101

Phone: (206) 516-3880

Fax: (206) 516-3883

13 Chelsea V. Samuels (*pro hac vice pending*)

csamuels@susmangodfrey.com

SUSMAN GODFREY L.L.P.

15 1900 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

16 Phone: (310) 789-3100

17 *Attorneys for Cosmos Granite (West) LLC*

18
19 Dated: July 11, 2021

By: /s/ Betsy A. Gillaspy (w/permission)

Betsy A. Gillaspy, WSBA#21340

bgillaspy@gillaspyrhode.com

Chelsey Thorne, WSBA #49740

cthorae@gillaspyrhode.com

GILLASPY & RHODE, PLLC

821 Kirkland Avenue, Suite 200

Kirkland, WA 98033

23 Phone: (425) 646-2956

25 Mark L. Hill (*Pro Hac Vice*)

Texas State Bar # 24034868

mark.hill@solidcounsel.com

26 Walker Steven Young (*Pro Hac Vice*)

Texas State Bar # 24102676

walker.young@solidcounsel.com
SCHEEF & STONE, LLP
2600 Network Boulevard, Suite 400
Frisco, TX 75034
Phone: (214) 472-2126

*Attorneys for Minagrex Corporation d/b/a MGX
Stone*

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SUSMAN GODFREY L.L.P.
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CERTIFICATE OF CONFERENCE

Counsel for Plaintiff conferred with counsel for Defendant in a telephonic meet and confer on July 9, 2021 (Chelsea Samuels and Walker Young participated), and counsel agreed that, per Minagrex's representations concerning the confidentiality of the documents at issue, a Stipulated Motion Seal was proper to protect the confidential information, and that there was no alternative to filing under seal.

/s/ Rachel S. Black
Rachel S. Black

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SUSMAN GODFREY L.L.P.
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ORDER

Based upon the foregoing and for good cause shown, the Court ORDERS that the Stipulated Motion to Seal/Redact is GRANTED.

DATED this 13th day of August, 2021.


RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Rachel S. Black
Rachel S. Black

CERTIFICATE OF SERVICE - 1

SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, WA 98101-3000
Tel: (206) 516-3880; Fax: (206) 516-3883